

ATTACHMENT A

DEFINITIONS

1. The terms "document" or "documents" means any written, recorded, electronic, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, email, computer storage devices or any other media, including but not limited to memoranda, notes, minutes, records, photographs, correspondence, telegrams, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, responses to questionnaires, charts, graphs, statements, notebooks, handwritten notes, applications, agreements, books, pamphlets, periodicals, appointment calendars, notes, diaries, records and recordings of oral conversations, work papers, and also including but not limited to, originals and all copies which are different in any way from the original whether by interlineation, receipt stamp, notation, indication of copies sent or received, or otherwise, and drafts, which are in the possession, custody or control of you, your present or former agents, representatives, or attorneys, or any and all persons acting on your behalf, including documents at any time in the possession, custody or control of such individuals or entities or known by you to exist.
2. The term "concerning" means relating to, referring to, describing, evidencing, or constituting.

DOCUMENTS TO BE PRODUCED

1. Any and all documents concerning the employment of Pamela Graeber ("Graeber") [SSN#180-36-2179], including, but not limited to, resumes, job applications, interview notes, correspondence concerning employment or prospective employment, records concerning communications with Graeber's former employers or other references, requests for references from any prospective employer of Graeber, sales performance records, performance evaluations, disciplinary notices, termination or resignation notices, payroll records, benefits information and/or any other personnel documents.